



U.S. Department of Justice

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January 20, 2021

The Honorable James K. Bredar
Chief United States District Judge
United States Courthouse
101 West Lombard Street
Baltimore, Maryland 21201

Re: *Hans Augustine Iduma v. United States of America*, Civil No. JKB-13-2995

Dear Chief Judge Bredar:

I write on behalf of Thomas Ragland and myself in response to this Court's Order of December 18, 2020, directing the parties to jointly propose the procedural steps necessary to implement the settlement agreement entered into between the parties. Mr. Ragland and I have consulted and below identify the steps we believe are necessary, with suggested dates by which each step may be achieved.

February 12, 2021 Government shall provide to the Defendant an information, waiver of indictment and plea agreement under Rule 11(c)(1)(C) of the Federal Rules of Criminal Procedure.

March 12, 2021 Defendant shall sign the plea, including negotiating any changes.

March 15, 2021
Or thereafter Plea hearing and sentencing. Parties to provide a proposed Order vacating the prior Judgment without prejudice (consistent with settlement agreement). Defendant shall be processed by United States Marshals Service. A new Judgment and Commitment Order shall be prepared.

The parties do not believe that a Presentence Report is necessary under these circumstances in order for this Court to accept the plea and sentence the Defendant. However, if a PSR is needed for administrative purposes, the Defendant will make himself available for an interview.

The parties welcome the opportunity to speak with the Court in a scheduling conference call if additional matters need to be discussed.

Thank you for your patience.

Respectfully submitted,

Robert K. Hur
United States Attorney

/s

By: _____
Tamera L. Fine
Assistant United States Attorney

CC: Thomas Ragland, Esquire